

WHITE PAPER • GREEN CLAIMS

How to avoid *greenwashing*

A seller's guide to environmental claims you can stand behind — and how to catch the ones you can't.

Every green claim is now a promise you can be made to keep

For years, "eco-friendly", "green" and "climate neutral" were marketing garnish — nice to add, rarely tested. That era is over. Every environmental claim a brand publishes is now a **testable promise**: a regulator can demand the evidence, a marketplace can pull the listing, a competitor can file a complaint, and a consumer organisation can put it in the press. Under the EU's **Empowering Consumers for the Green Transition Directive ((EU) 2024/825)**, vague claims are not merely frowned upon — they are becoming **unlawful**.

This is not a consumer guide to *spotting* greenwashing. It is the **seller's** guide to not committing it: what actually counts as greenwashing, why the rules just tightened, what really happens if you are accused, and the one method that makes a claim survive scrutiny — **say it and prove it**. It closes by showing how the Conphora **GreenWashing Check** scans your own live pages, flags the claims you cannot yet defend, scores the risk and tells you what to correct.

The goal is not silence. A credible sustainability story is a genuine commercial asset — the point is to make claims you can **prove**, and to catch the ones you cannot before someone else does.

General guidance, not legal advice. Rules vary by market and claim type and are changing — confirm specifics with the competent authority. The GreenWashing Check is decision-support, not a legal determination.

What greenwashing actually is

Greenwashing is not only outright lying. Most of it is ordinary marketing that overstates, under-proves or quietly misleads. The common traps:

Trap	What it looks like	Why it fails
Vagueness	"Eco-friendly", "green", "sustainable", "natural" with no specifics	Means nothing verifiable; the new EU rules treat generic claims as misleading
No proof	A benefit asserted with no evidence on file	If you cannot substantiate it before publishing, you cannot make it
The hidden trade-off	"Made with recycled paper" — on a product flown in single-use plastic	True of one attribute, silent on the bigger harm
Irrelevance	"CFC-free!" on something where CFCs are already banned	Technically true, deliberately impressive, meaningless
The lesser evil	"Greener" than an inherently harmful baseline	Distracts from the category's real impact
The fib / fake label	A self-made "eco" badge dressed up as certification	Implies third-party approval that does not exist
The empty pledge	"Climate neutral by 2040" with no plan or milestones	Unsubstantiated future claims are specifically targeted

The fix is almost always the same move — make it **specific and evidenced**:

"Eco-friendly packaging" → "Box made with 70% recycled cardboard, certified by [scheme]; recyclable in standard kerbside collection."

"Climate neutral" → "We measure and reduce our product emissions year on year; remaining emissions for 2025 were offset via [project] — see our methodology." (And note: offset-based "neutral" claims are now restricted — see Special cases.)

Why the rules just tightened

Greenwashing has moved from a reputational risk to a **legal** one, fast. The key pieces:

- **Empowering Consumers for the Green Transition — Directive (EU) 2024/825.** Amends the Unfair Commercial Practices Directive and the Consumer Rights Directive. It **bans generic environmental claims** ("environmentally friendly", "green", "eco") where excellent environmental performance cannot be demonstrated, **bans unsubstantiated future-performance claims** (e.g. "climate neutral by 2040" without a clear, costed plan), and **restricts sustainability labels** to those based on certification schemes or set by public authorities. Member states transpose it by **27 March 2026** and apply it from **27 September 2026**.
- **The proposed Green Claims Directive.** Would require explicit environmental claims to be **substantiated up front** and **independently verified** before use. Still a proposal — not yet final law — but it signals the direction of travel: evidence first, claim second.
- **The UCPD baseline — Directive 2005/29/EC.** Already prohibits misleading actions *and* misleading omissions. A claim that is literally true but leaves out a material fact is already unlawful today.
- **Denmark — markedsføringsloven.** The Marketing Practices Act's good-marketing-practice rule and **documentation requirement** mean you must be able to **document** factual claims, including environmental ones, when you make them. The Consumer Ombudsman (Forbrugerombudsmanden) publishes a quick-guide on environmental and ethical marketing.
- **Enforcement is coordinated.** EU and national authorities ran a **2024 greenwashing sweep** of company websites, and the CPC network can act across borders on widespread infringements.

***The timeline that matters:** transposition of Dir. (EU) 2024/825 by **27 Mar 2026**, application from **27 Sep 2026**. Generic green claims and empty future pledges should be off your packaging and pages well before then.*

What happens if you're accused

The implications are concrete, and they compound. A single weak claim can trigger several of these at once:

- **Regulatory.** Orders to **stop or correct** the claim, injunctions, and fines under the UCPD as transposed nationally (in Denmark, under markedsføringsloven). Serious or cross-border cases can draw **coordinated CPC** enforcement.
- **Marketplace & retail.** Amazon and major retailers police on-pack and on-page environmental claims; an unproven claim can mean **claim removal, suppression or delisting** — losing the channel at the worst

moment.

- **Civil & competitor.** Competitors can bring **unfair-competition** actions over misleading or comparative claims; NGOs and consumer groups file complaints with the authority and amplify them.
- **Reputational & commercial.** The claim was meant to *earn* trust; an accusation **destroys** the very premium it was reaching for, and tends to attract press.
- **Operational.** Repackaging, re-shot campaigns, recalled collateral, and an internal scramble to find evidence that should have existed before the claim went live — paid for in time and money you did not budget.

The cheapest of these is the one you prevent by having the evidence on file in the first place.

The anatomy of a claim you can stand behind

Before any environmental claim is published, run it through six tests. If it fails one, fix it or drop it.

1. **Specific** — *what exactly*, and which part of the lifecycle? "Recyclable" — the whole product, or just the cap? Name the attribute and its boundary.
2. **Substantiated** — the evidence exists **before** you publish: test data, certification, a supplier declaration, a calculation with a stated method.
3. **Verifiable** — an independent third party could check it with the information you can provide.
4. **Proportionate** — no overstating; disclose material trade-offs. One green attribute does not make the product green.
5. **Clear** — plain words, no vague buzzwords; the average consumer reads it the way you mean it.
6. **Current** — re-checked as the product, supplier or supply chain changes; yesterday's true claim can quietly become false.

These map onto **ISO 14021** (self-declared environmental claims) and the principles regulators apply: claims must be accurate, substantiated, and not misleading by omission.

A step-by-step playbook to avoid it

1. **Inventory every live claim.** Packaging, website, ads, marketplace listings, sales decks, social — list each environmental claim in one place. You cannot defend what you have not catalogued.
2. **Classify each claim** — generic vs specific, explicit vs implied, comparative, future/target, or a **label/badge**. Each type carries different evidence demands.
3. **Demand evidence for each.** No evidence on file → no claim. This single rule removes most exposure.
4. **Rewrite vague claims** into specific, substantiated ones (see the before/after pattern above).
5. **Substantiate future and target claims** with a real, costed plan and interim milestones — or remove the date.
6. **Vet your labels.** Keep only third-party certifications or public-authority schemes; retire self-invented "eco" badges.
7. **Keep an evidence file per claim** — the claim, its wording, the proof, the source, the date, and who signed it off. This is what you hand a regulator.

8. **Monitor continuously.** Re-check on every product change, supplier switch or copy edit. Compliance is a state you maintain, not a box you tick once.

Special cases worth extra care

- **"Carbon / climate neutral" and offsets.** Offset-based "neutral" claims are now specifically restricted; if you make any net claim, be precise about what is measured, what is reduced, and what (if anything) is offset, and link a methodology.
- **Recycled & recyclable.** State the **percentage** and whether it refers to the product, the packaging, or a component — and whether recyclability is realistic in the consumer's actual collection system.
- **"Natural" / "plastic-free".** Easy to overclaim; define the boundary and hold evidence.
- **Comparative claims.** "Greener than..." needs a fair, like-for-like, substantiated comparison — not a flattering baseline.
- **Sustainability labels & self-badges.** Only certification-based or authority-set labels survive the new rules; a homemade badge is now a liability.

Don't overcorrect into greenhushing

The wrong reaction to all this is to go silent — strip every green claim and say nothing. That **greenhushing** forfeits a real, provable advantage, and in some cases misleads by omission too. Credible, evidenced sustainability remains a genuine differentiator and a condition of access to many retailers and marketplaces. The answer to greenwashing is not silence; it is **proof**. (For why getting this right is a commercial lever, see the companion paper [Compliance as a competitive advantage](#).)

How the Conphora GreenWashing Check helps

Cataloguing and re-checking every claim across a live website by hand does not scale. The Conphora **GreenWashing Check** automates it.

You enter your organisation's website (Figure 1). The Check **crawls your live pages**, identifies environmental and sustainability claims, and assesses each against **good-marketing-practice rules** (**markedsføringsloven § 3**) and the EU green-claims framework.

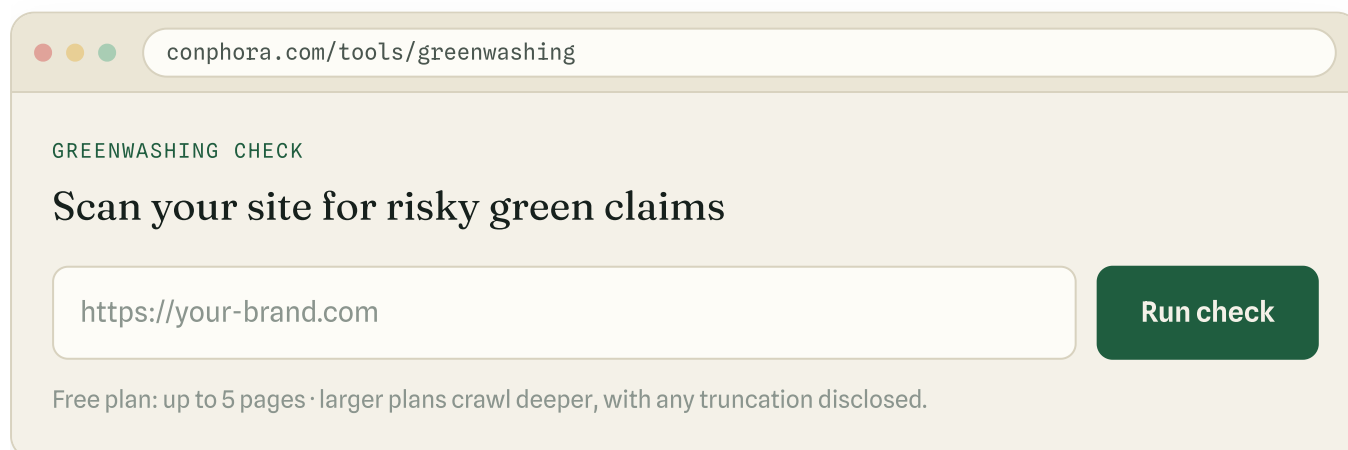


FIGURE 1 — START A SCAN: ENTER YOUR DOMAIN AND RUN THE CHECK.

It returns a **per-domain report** (Figure 2) with a summary of how many pages were scanned and how many claims were flagged, broken down by risk:

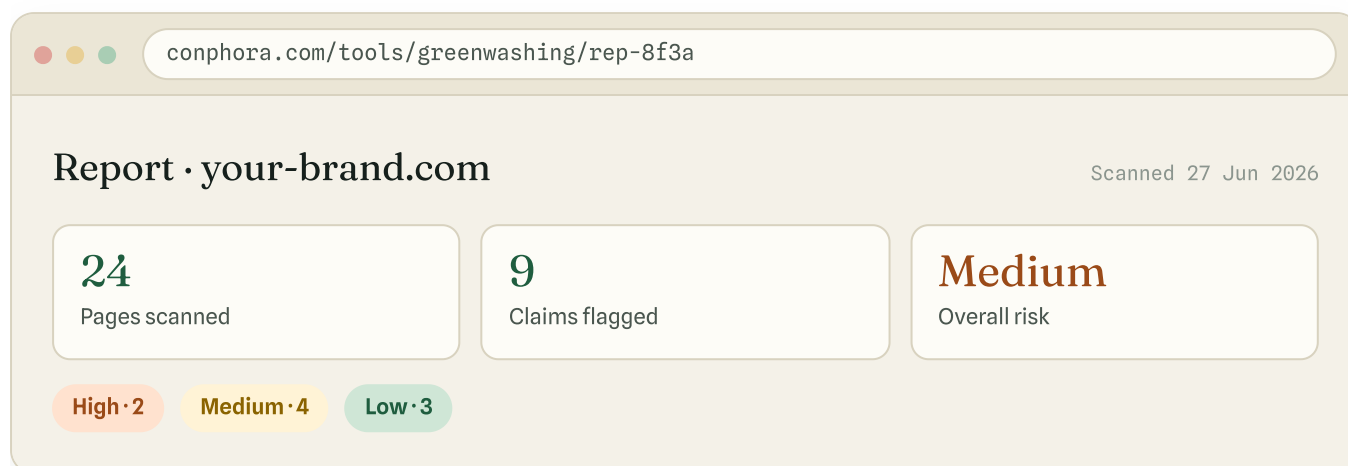


FIGURE 2 – THE PER-DOMAIN REPORT: PAGES SCANNED, CLAIMS FLAGGED, RISK BREAKDOWN.

Every flagged claim then comes with the exact claim and where it appears, **why** it reads as risky, a **confidence / risk score** so you triage the worst first, and **specific guidance on what to correct** (Figure 3):

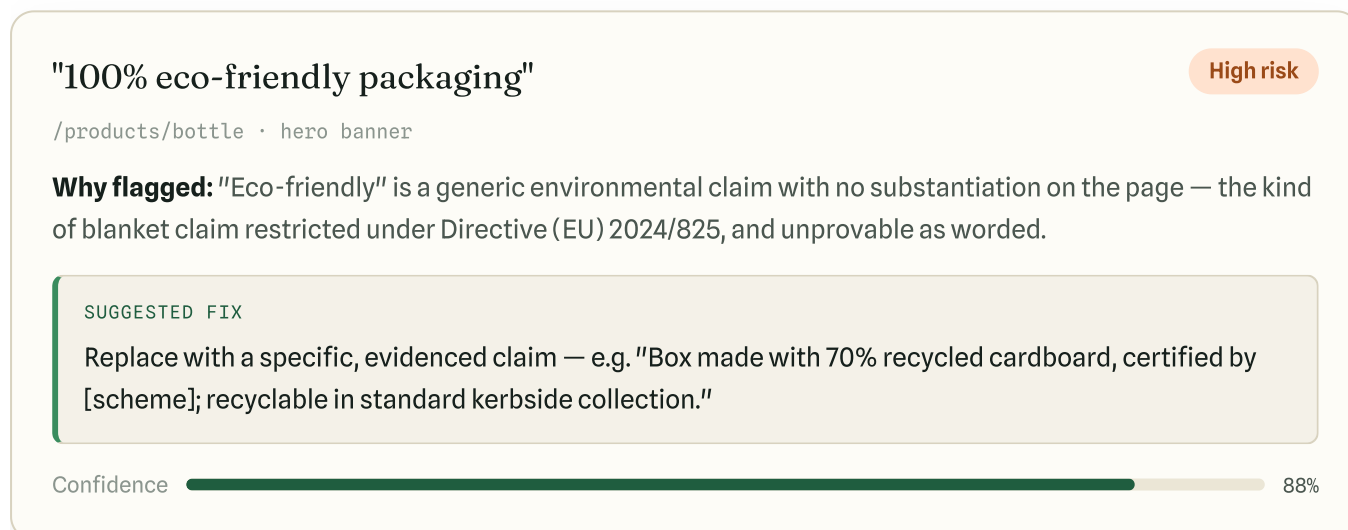


FIGURE 3 – A FLAGGED-CLAIM CARD: THE CLAIM, WHY IT'S RISKY, AND A SUGGESTED FIX.

Crawl depth scales with your plan, and any truncation of a large site is always disclosed. Best of all, it is **repeatable**: re-scan after each fix or content change to **monitor** your exposure over time, so a new campaign or a supplier-driven copy change cannot quietly reintroduce a claim you cannot defend. Find it at [Tools → GreenWashing Check](#).

The Check is decision-support that surfaces and explains risk — not a legal determination. It tells you where to look and what to fix; you (and where needed, your adviser) make the call.

Common pitfalls — a quick checklist

- Generic "eco / green / natural / sustainable" with nothing specific behind it.
- A self-made badge dressed up to look like a certification.
- "Carbon neutral" resting entirely on offsets, with no measurement or reduction.
- A "by 2040" pledge with no plan, budget or milestones.

- A claim about one component presented as if it were the whole product.
- Marketing copy that outran the evidence — published first, substantiated never.
- Never re-checking a claim after a supplier or formulation change.

Sources & references

1. Directive (EU) 2024/825 — Empowering consumers for the green transition (amending the UCPD 2005/29/EC and the Consumer Rights Directive). EUR-Lex.
2. Directive 2005/29/EC — Unfair Commercial Practices Directive (misleading actions & omissions). EUR-Lex.
3. European Commission — Proposal for a Directive on substantiation and communication of explicit environmental claims (Green Claims Directive).
4. Forbrugerombudsmanden — quick-guide on environmental and ethical marketing; Danish markedsføringsloven (good-marketing-practice rule & documentation requirement).
5. ISO 14021 — Environmental labels and declarations: self-declared environmental claims (Type II).
6. European Commission / CPC network — 2024 coordinated screening ("sweep") of greenwashing on company websites.

This white paper is for general guidance and does not constitute legal advice. Whether a specific claim is lawful depends on its wording, evidence, product and market, and the rules are changing; confirm current requirements against the primary legislation and the competent authority before acting. The Conphora GreenWashing Check is decision-support, not a legal determination. © 2026 Conphora.